

CRYSTALLEX INTERNATIONAL CORP., )  
 )  
 Plaintiff, )  
 )  
 v. ) Misc. No. 17-151-LPS  
 )  
 BOLIVARIAN REPUBLIC OF VENEZUELA, )  
 )  
 Defendant. )

Robert B. Pincus, in his capacity as special master (the “**Special Master**”) for the United States District Court for the District of Delaware (the “**Court**”) in *Crystallex International Corp. v. Bolivarian Republic of Venezuela* (D. Del. Case. No. 17-151-LPS), with the assistance of his advisors, and in consultation with the Sale Process Parties, has selected his recommended bid, pursuant to the *Memorandum Order Regarding Sale Process and Litigation* dated December 31, 2024 (D.I. 1517).

Given the numerous documents that need to be finalized and filed in connection with the recommendation, including the long-form recommendation, the Special Master will not be in a position to finalize and publicly file all of those documents tonight. Accordingly, the Special Master respectfully requests the Court’s permission to file his recommendation along with all of the associated filings, including the executed Stock Purchase Agreement (“**SPA**”), as soon as practicable tomorrow (i.e., Friday, March 21, 2025).

OF COUNSEL:

Matthew S. Barr (Admitted *pro hac vice*)  
David Lender (Admitted *pro hac vice*)  
Jared R. Friedmann (Admitted *pro hac vice*)  
Chase A. Bentley (Admitted *pro hac vice*)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Matt.Barr@weil.com  
David.Lender@weil.com  
Jared.Friedmann@weil.com  
Chase.Bentley@weil.com

Dated: March 20, 2025  
12126354/ 21202.00001

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ Myron T. Steele  
Myron T. Steele (#0002)  
Matthew F. Davis (#4696)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
msteele@potteranderson.com  
mdavis@potteranderson.com  
bpalapura@potteranderson.com

*Counsel for Special Master Robert B. Pincus*